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March 24, 1997

The Honorable Reed Hundt
Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Dear Chairman Hundt:

Enclosed, please find five copies of comments submitted by the Special Libraries Association regarding use of the public switched telephone network by information service and Internet Access Providers (cc Docket No. 96-263).

The Special Libraries Association appreciates this opportunity to provide you with this information. I hope that it is of value to you in this matter.

Sincerely,

David R. Bender, Ph.D.
Executive Director

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

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Usage of the Public Switched
Network by Information Service
and Internet Access Providers

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CC Docket No. 96-263

COMMENTS OF
THE SPECIAL LIBRARIES ASSOCIATION

David R. Bender, Ph.D., Executive Director
John H. Crosby IV, Director, Government Relations
Special Libraries Association
1700 18th Street, N.W.
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(202) 234-4700

Dated March 21, 1997

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**COMMENTS OF
THE SPECIAL LIBRARIES ASSOCIATION**

The Special Libraries Association (SLA), pursuant to Section 1.415 of the Commission's rules, hereby submits its comments in response to the Notice of Inquiry (NOI) released December 24, 1996, regarding Use of the Public Switched Network by Information Service and Internet Access Providers.

SLA represents nearly 15,000 information professionals who are dedicated to putting knowledge to work to attain the goals of their organizations. They are employed most frequently by corporations, private businesses, government agencies, museums, colleges, hospitals, associations, and information management consulting firms. Today's special librarians do far more than locate and collect data. Using the Internet and other information technologies, they also evaluate, analyze, organize, package, and present information in a way that maximizes its usefulness.

A few examples of the diverse services that special librarians may perform include:

- Preparing research reports in response to staff inquiries;
- Gathering competitive intelligence;

- Creating databases for internal information;
- Evaluating and comparing information software and sources of data prior to purchase;
- Training other staff to efficiently and cost-effectively use online databases.

SLA members are very aware of the present and future impacts of the Internet on many cultures around the globe; in particular, the United States. Never before has one communications tool created such massive potential for interaction among governments, businesses, researchers, students, and the general public. This ever-burgeoning technological advance promises to change the way we live, work, play, and socialize in the global community. However, as with any technology that so pervasively affects our lives, it should come as no surprise that many new problems have arisen due to the advent of the Internet.

In the Notice of Proposed Rulemaking (NPRM) on reform of the interexchange carrier charges for voice communications, the Commission accurately recognized the amazing rate of growth in usage of interactive computer services such as the Internet for education, business, research, and consumer-related activities. SLA members are at the forefront in using the Internet and developing Intranets for all of these purposes. They see the magnificent opportunities that are available to help students learn, to improve the flow of knowledge in office environments, to put information at the fingertips of scientists and scholars, and to better market products and services to the public. Yet it is also clear to SLA members that, as newer and more demanding audio-visual technologies emerge and are

implemented, greater demands are placed on a network that was not intended for graphics- and data-intensive communications.

In the United States, organizations with sufficient resources have begun to use high bandwidth lines to either establish an Internet Point of Presence (POP) or to connect through a POP. However, less affluent organizations and a commanding majority of households must access the Internet through very slow modems and the public switched telephone network (PSTN). Developments in modem technology will allow for faster transfer of data in the future, but the problems associated with data communications over the PSTN require more serious consideration.

Current switch technology and local telephone networks are set up for the quick transmission of voice calls. The average call holding time for data communications is often 5 to 10 times longer than that for voice communications. Browsing the Internet, regardless of how quickly data is transferred, is intrinsically different from voice communication. Even though both voice and data calls are placed over the PSTN, the similarities end there.

It is widely known that central-office switches cannot manage data transmissions efficiently because they are configured for voice communications. Callers need a clear connection, since a voice conversation constantly flows and there is little or no dead air time. Data traffic travels in packets and flows over the network in bursts, leaving large amounts of dead air time.

The Regional Bell Operating Companies (RBOCs) have conducted studies and concluded that the PSTN is becoming congested, due to the extended call holding times for data communications. Whether the congestion is due to increased data or voice communications, it is clear that data transmissions need to flow on a packet-switched network, rather than a network set up for voice communications. It would seem that the short-term solution is to discourage extended access to the Internet and online services through increased costs for access. Increased revenues could then be used to develop a high-speed, packet-switched network for routing data transmissions. According to the RBOCs, the logical method for doing so would be to eliminate the access charge exemption for Enhanced Service Providers (ESPs).

SLA believes that this is unwise, and that it is merely a continuation of the same anticompetitive policies that are currently being reformed by the Commission. SLA applauds the Commission's decision to reject a repeal of the ESP exemption in the NPRM on access charge reform. The private sector marketplace has always provided excellent solutions to complex problems, usually at reasonable cost. Since the long-term goal is to get Internet traffic off the PSTN, the question remains whether the infrastructure improvements required to achieve this goal need to be implemented today. It is very likely that the development of new, alternative technologies could assist in getting Internet traffic off the PSTN in the short term. Given that Internet traffic is expected to rise exponentially in the next decade, use of a short-term solution may allow for the costs of infrastructure improvements to fall.

The Commission should also assess the tendencies of Internet users. If the average browser spends 20 to 30 minutes online each time they access the Internet, ISPs should provide incentives for lowering call holding times. Service providers should also seek to educate users on more efficient browsing and research methods. Software developers should develop and promote products that allow for off-line browsing. Phone companies should seek out partnerships with ISPs to develop low-cost alternatives for expanding the data communications network.

The Commission should encourage concerned parties to accept the burden of making the Internet work for everyone. Instead of raising the costs of access and discouraging use, the Commission should work to raise awareness of the problem and place the responsibility of solving that problem on the shoulders of all parties involved.

Respectfully submitted

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